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November 28, 2001

Ms. Gloria Blue  
Executive Secretary  
Trade Policy Staff Committee  
Office of the United States Trade Representative  
600 17<sup>th</sup> Street, N.W.  
Washington, D.C. 20508

Re: Section 203 Consideration of Certain Steel Products

Dear Ms. Blue:

The Viraj Group, an Indian stainless steel producer and exporter, requests the exclusion of stainless steel angles ("SSA") from any remedy action in the above-referenced matter. SSA was included in the ITC's affirmative §201 injury decision in the more general §201 product group stainless steel bars and shapes.

Earlier this year, the United States imposed anti-dumping duties of 50% or more on SSA from Korea, Japan and Spain. SSA imports from Korea, Japan and Spain, which accounted for the vast majority of SSA imports, thereafter essentially ceased as a result of these prohibitive anti-dumping duties. Thus, SSA imports overall have dropped dramatically. A remedy has already been provided for SSA imports that could have been the source of any injury.

The ITC has long held that SSA is a separate like product from stainless steel bars as in fact the two are not interchangeable and are distinct products that serve distinct needs. We believe that SSA has erroneously been included in the same product category as stainless steel bar for §201 purposes. But that does not prevent finding that the appropriate remedy is for SSA to be excluded from any §201 import restrictions.

Please advise as to any questions.

Respectfully submitted,

Peter Koenig  
Counsel to The Viraj Group

